

1 H. H. (“Shashi”) Kewalramani (State Bar No. 262290)  
2 shashi@ljpklaw.com  
3 LEE, JORGENSEN, PYLE & KEWALRAMANI, P.C.  
4 440 W. 1<sup>st</sup> Street, Suite 205  
5 Tustin, California 92780  
6 Telephone: (714) 252-6611  
7 Facsimile: (714) 602-4690

8 Attorneys for Plaintiff,  
9 **O.S. SECURITY LLC**

10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA  
12 SOUTHERN DIVISION

13 O.S. SECURITY LLC,

14 Plaintiff,

15 v.

16 ALARM LOCK SYSTEMS, INC. and  
17 NAPCO SECURITY  
18 TECHNOLOGIES, INC.,

19 Defendants.  
20

**CASE NO. SA CV 14-00312**

**ORIGINAL COMPLAINT FOR  
INFRINGEMENT OF U.S. PATENT  
NOS. 7,456,725; 7,482,907 and  
7,683,758**

**DEMAND FOR JURY TRIAL**

21 **ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**  
22

23 This is an action for patent infringement in which Plaintiff, O.S. Security LLC  
24 (“OSS” or “Plaintiff”), complains against Defendants, Alarm Lock Systems, Inc. and  
25 Napco Security Technologies, Inc. (collectively “Defendants”), as follows:  
26  
27  
28

## THE PARTIES

1  
2 1. Plaintiff, O.S. Security LLC, is a Texas limited liability company, having  
3  
4 an address in Plano, Texas 75093.

5 2. On information and belief, Defendant Alarm Lock Systems, Inc. is a  
6  
7 corporation organized under the laws of the State of Delaware with its principal place  
8 of business at 345 Bayview Avenue, Amityville, New York 11701. Defendant Napco  
9 Security Technologies, Inc. is a corporation organized under the laws of the State of  
10 Delaware with its principal place of business at 333 Bayview Avenue, Amityville, NY  
11 11701. Defendant Alarm Lock Systems, Inc. may be served with process by serving  
12 its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209  
13 Orange Street, Wilmington, Delaware 19801. Defendant Napco Security  
14 Technologies, Inc. may also be served with process by serving its registered agent,  
15 Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801. On  
16 information and belief, and Napco Security Technologies, Inc. website at  
17 [www.napcosecurity.com/historyt.html](http://www.napcosecurity.com/historyt.html), Defendant Alarm Lock Systems, Inc. is a wholly  
18 owned subsidiary of Defendant Napco Security Technologies, Inc.  
19  
20  
21  
22

## JURISDICTION AND VENUE

23  
24  
25 3. This action arises under the patent laws of the United States, Title 35 of  
26 the United States Code. This Court has subject matter jurisdiction pursuant to 28  
27 U.S.C. §§ 1331 and 1338(a).  
28

4. This Court has personal jurisdiction over Defendants because they have purposely availed themselves of the privileges and benefits of the laws of California. Additionally, this Court has personal jurisdiction over the Defendants because the Defendants have committed, aided, abetted, contributed to, and/or participated in the commission of acts giving rise to this action within this judicial district and have established minimum contacts within the forum such that the exercise of jurisdiction over Defendants would not offend traditional notions of fair play and substantial justice. The Defendants have sold, advertised, solicited customers, marketed and/or distributed the infringing products in this judicial district and have designed, made, or had made, on their behalf, and placed the infringing products into the stream of commerce with the reasonable expectation and/or knowledge that actual or potential ultimate purchasers and users for such products were located within this judicial district. According to its website, [www.alarmlock.com/fieldreps.html#CA](http://www.alarmlock.com/fieldreps.html#CA), Defendants have sales representatives in Murrieta, California and Tiburon, California.

5. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391 and 1400(b).

## JOINDER

6. Joinder is proper under 35 U.S.C. § 299. The allegations of patent infringement contained herein arise out of the same series of transactions or occurrences relating to the making, using, offering for sale, and/or selling within the

1 United States, and/or importing into the United States, of the same accused devices  
2 employing electronic access control devices, including, but not limited to, Alarm  
3 Lock's PDL3000 series electronic locks.  
4

5 7. Common questions of fact relating to Defendants' infringement will arise  
6 in this action.  
7

8 **INFRINGEMENT OF U.S. PATENT NO. 7,456,725**  
9

10 8. Plaintiff, OSS, is the owner by assignment of United States Patent No.  
11 7,456,725 ("the `725 patent"), entitled "Electronic Access Control Device Utilizing A  
12 Single Microcomputer Integrated Circuit," and owns all rights to sue, and collect  
13 damages, including past damages, for infringement of the `725 patent. A true and  
14 correct copy of the `725 patent, which was duly and legally issued by the United States  
15 Patent and Trademark Office ("USPTO") on November 25, 2008, is attached hereto as  
16 Exhibit A.  
17  
18

19 9. With knowledge of the `725 patent at least as early as the service of this  
20 Complaint, the Defendants have been and are, in this judicial district and elsewhere in  
21 the United States, actively inducing infringement of the `725 patent. Defendants'  
22 inducements include, without limitation and with specific intent to encourage the  
23 infringement, knowingly inducing others (including, but not limited to, Defendants'  
24 business partners, sales agents, and customers) to use, offer for sale, and/or sell within  
25 the United States, and/or import into the United States, electronic access control  
26  
27  
28

1 devices, including, but not limited to, Alarm Lock's PDL3000 series electronic locks,  
2 which Defendants know infringe one or more claims of the '725 patent. Each of the  
3 Defendants is thus liable for infringement of the '725 patent pursuant to 35 U.S.C. §  
4 271(b).

6           10. Defendants have profited through the infringement of the '725 patent.  
7 As a result of Defendants' unlawful infringement of the '725 patent, Plaintiff has  
8 suffered and will continue to suffer damage. Plaintiff is entitled to recover from  
9 Defendants damages that are adequate to compensate it for the infringement under 35  
10 U.S.C. § 284, but in no event less than a reasonable royalty.

13           11. To the extent that facts learned in discovery show that any one of the  
14 Defendants' infringements of the '725 patent is or has been willful, Plaintiff reserves  
15 the right to request such a finding at time of trial.

17  
18                           **INFRINGEMENT OF U.S. PATENT NO. 7,482,907**

19           12. Plaintiff, OSS, is the owner by assignment of United States Patent No.  
20 7,482,907 ("the '907 patent"), entitled "Electronic Access Control Device," and owns  
21 all rights to sue, and collect damages, including past damages, for infringement of the  
22 '907 patent. A true and correct copy of the '907 patent, which was duly and legally  
23 issued by the United States Patent and Trademark Office ("USPTO") on January 27,  
24 2009, is attached hereto as Exhibit B.

1           13. Defendants have been and are directly infringing the `907 patent in this  
2 judicial district, and elsewhere in the United States. Defendants' direct infringements  
3 include, without limitation, making, using, offering for sale, and/or selling within the  
4 United States, and/or importing into the United States electronic access control  
5 devices, including, but not limited to, Alarm Lock's PDL3000 series electronic locks.  
6 Each of the Defendants is thus liable for infringement of the `907 patent pursuant to 35  
7 U.S.C. § 271(a).  
8  
9

10           14. Defendants, at a minimum, have knowledge of the '907 patent through  
11 the filing and service of this Complaint, and upon information and belief have  
12 continued making, using, importing, offering for sale, and/or selling electronic access  
13 control devices, including, but not limited to, Alarm Lock's PDL3000 series electronic  
14 locks.  
15  
16

17           15. With knowledge of the `907 patent at least as early as the service of this  
18 Complaint, Defendants have been and are, in this judicial district and elsewhere in the  
19 United States, actively inducing infringement of the `907 patent. Defendants'  
20 inducements include, without limitation and with specific intent to encourage the  
21 infringement, knowingly inducing others (including, but not limited to, Defendants'  
22 business partners, sales agents, and customers) to use, offer for sale, and/or sell within  
23 the United States, and/or import into the United States, electronic access control  
24 devices, including, but not limited to, Alarm Lock's PDL3000 series electronic locks,  
25  
26  
27  
28

1 which Defendants know infringe one or more claims of the `907 patent. Each of the  
2 Defendants is thus liable for infringement of the `907 patent pursuant to 35 U.S.C. §  
3 271(b).  
4

5 16. With knowledge of the `907 patent at least as early as the service of this  
6 Complaint, Defendants have been and are, in this judicial district and elsewhere in the  
7 United States, actively contributing to the infringement of the `907 patent.  
8 Defendants' contributions include, without limitation, making, using, offering to sell  
9 and/or selling within the United States, and/or importing into the United States, one or  
10 more components including at least Alarm Lock's PDL3000 series electronic locks,  
11 which constitute a material part of the invention recited in one or more claims of the  
12 `907 patent, knowing the Alarm Lock's PDL3000 series electronic locks to be  
13 especially made or especially adapted for use in an infringement of the `907 patent,  
14 and not staple articles or commodities of commerce suitable for substantial non-  
15 infringing use. Each of the Defendants is thus liable for infringement of the `907  
16 Patent pursuant to 35 U.S.C. § 271(c).  
17  
18  
19  
20  
21

22 17. Defendants have profited through the infringement of the `907 patent.  
23 As a result of Defendants' unlawful infringement of the `907 patent, Plaintiff has  
24 suffered and will continue to suffer damage. Plaintiff is entitled to recover from  
25 Defendants damages that are adequate to compensate it for the infringement under 35  
26 U.S.C. § 284, but in no event less than a reasonable royalty.  
27  
28

1           18. To the extent that facts learned in discovery show that any one of the  
2 Defendants' infringements of the '907 patent is or has been willful, Plaintiff reserves  
3 the right to request such a finding at time of trial.  
4

5  
6                           **INFRINGEMENT OF U.S. PATENT NO. 7,683,758**

7           19. Plaintiff, OSS, is the owner by assignment of United States Patent No.  
8 7,683,758 ("the `758 patent"), entitled "Electronic Access Control Device," and owns  
9 all rights to sue, and collect damages, including past damages, for infringement of the  
10 `758 patent. A true and correct copy of the `758 patent, which was duly and legally  
11 issued by the United States Patent and Trademark Office ("USPTO") on March 23,  
12 2010, is attached hereto as Exhibit C.  
13

14           20. Defendants have been and are directly infringing the `758 patent in this  
15 judicial district, and elsewhere in the United States. Defendants' direct infringements  
16 include, without limitation, making, using, offering for sale, and/or selling within the  
17 United States, and/or importing into the United States electronic access control  
18 devices, including, but not limited to, Alarm Lock's PDL3000 series electronic locks.  
19 Each of the Defendants is thus liable for infringement of the `758 patent pursuant to 35  
20 U.S.C. § 271(a).  
21  
22  
23  
24

25           21. Defendants, at a minimum, have knowledge of the `758 patent through  
26 the filing and service of this Complaint, and upon information and belief have  
27 continued making, using, importing, offering for sale, and/or selling electronic access  
28

1 control devices, including, but not limited to, Alarm Lock's PDL3000 series electronic  
2 locks.

3  
4 22. With knowledge of the '758 patent at least as early as the service of this  
5 Complaint, each of the Defendants has been and is, in this judicial district and  
6 elsewhere in the United States, actively inducing infringement of the '758 patent.  
7 Defendants' inducements include, without limitation and with specific intent to  
8 encourage the infringement, knowingly inducing others (including, but not limited to,  
9 Defendants' business partners, sales agents, and customers) to use, offer for sale,  
10 and/or sell within the United States, and/or import into the United States, electronic  
11 access control devices, including, but not limited to, Alarm Lock's PDL3000 series  
12 electronic locks, which Defendants know infringe one or more claims of the '758  
13 patent. Each of the Defendants is thus liable for infringement of the '758 patent  
14 pursuant to 35 U.S.C. § 271(b).  
15  
16  
17  
18

19 23. With knowledge of the '758 patent at least as early as the service of this  
20 Complaint, Defendants have been and are, in this judicial district and elsewhere in the  
21 United States, actively contributing to the infringement of the '758 patent.  
22 Defendants' contributions include, without limitation, making, using, offering to sell  
23 and/or selling within the United States, and/or importing into the United States, one or  
24 more components including at least Alarm Lock's PDL3000 series electronic locks,  
25 which constitute a material part of the invention recited in one or more claims of the  
26  
27  
28

1 '758 patent, knowing the Alarm Lock's PDL3000 series electronic locks to be  
2 especially made or especially adapted for use in an infringement of the '758 patent,  
3 and not staple articles or commodities of commerce suitable for substantial non-  
4 infringing use. Each of the Defendants is thus liable for infringement of the '758  
5 Patent pursuant to 35 U.S.C. § 271(c).  
6  
7

8 24. Defendants have profited through the infringement of the '758 patent.  
9 As a result of Defendants' unlawful infringement of the '758 patent, Plaintiff has  
10 suffered and will continue to suffer damage. Plaintiff is entitled to recover from  
11 Defendants damages that are adequate to compensate it for the infringement under 35  
12 U.S.C. § 284, but in no event less than a reasonable royalty.  
13  
14

15 25. To the extent that facts learned in discovery show that any one of the  
16 Defendants' infringements of the '758 patent is or has been willful, Plaintiff reserves  
17 the right to request such a finding at time of trial.  
18  
19

### 20 **PRAYER FOR RELIEF**

21 WHEREFORE, Plaintiff prays for judgment and seeks the following relief:

- 22 (a) For judgment in favor of Plaintiff that Defendants have directly  
23 infringed, induced others to infringe, and/or contributed to others'  
24 infringement of the '725 patent, '907 patent and '758 patent;  
25  
26 (b) For judgment and an order requiring Defendants to pay Plaintiff its  
27 damages, costs, expenses, prejudgment and post-judgment interest,  
28 and post-judgment royalties for Defendants' infringement of the  
'725 patent, '907 patent and '758 patent, as provided under 35  
U.S.C. § 284;

- 1 (c) For judgment and an order that this case is exceptional under 35  
2 U.S.C. § 285 and requiring Defendants to pay Plaintiff's  
3 reasonable attorneys' fees; and  
4 (d) For such other and further relief as the Court may deem just and  
5 proper.

6 **JURY DEMAND**

7 Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby  
8 demands a jury trial on all issues and claims so triable.  
9

10  
11 Dated: March 3, 2014

Respectfully submitted,

12 LEE, JORGENSEN, PYLE &  
13 KEWALRAMANI, P.C.

14  
15 /s/  
16 H. H. ("Shashi") Kewalramani

17 Attorneys for Plaintiff  
18 O.S. SECURITY LLC  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28